

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA) Criminal No. 03-10234-MLW
)
)
v.)
)
JOSHUA GOLDSMITH)
)
)
)

**MOTION TO MODIFY TERMS OF
PRETRIAL RELEASE**

Defendant Joshua Goldsmith respectfully requests that this Court modify the terms of his pre-trial release. In support, Mr. Goldsmith states as follows:

1. Under the current terms of his release, Mr. Goldsmith is permitted to travel within the Commonwealth of Massachusetts, without the prior approval of this Court.
2. Mr. Goldsmith wishes to travel to 35 Champlin St., Newport, Rhode Island, leaving Thursday November 25, 2004 and returning the same day. He wishes to spend the day with his extended family for the Thanksgiving Holiday. He will be attending the Thanksgiving gathering with his parents, Max Goldsmith, and Aline Goldsmith.
3. I spoke with Pretrial Services Officer David Picozzi today, Tuesday, November 23, 2004. He has no opposition to this motion, and has been served with a copy of this motion at his request.

4. I left a message with United States Attorney Robert Peabody today, Tuesday, November 23, 2004 to determine whether he had any opposition to this motion. I have not yet received a response. Based upon his phone message recording I believe he may be out of the office for the remainder of the week.

WHEREFORE, Mr. Goldsmith respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel to Rhode Island on November 25, 2004.

Respectfully Submitted
Joshua Goldsmith,
By His Attorneys,



Stephen Hrones (BBO No. 242860)
Jessica D. Hedges (BBO No. 645847)
Hrones and Garrity
Lewis Wharf -- Bay 232
Boston, MA 02110-3927

CERTIFICATE OF SERVICE

I, Jessica Hedges, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Robert Peabody by first class mail, this 23^d day of November, 2004.



Jessica D. Hedges